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8 *Tesla, Inc.*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 NICHOLAS YEATREKAS, an individual,
12 Plaintiff,
13 vs.
14 TESLA, INC., a Foreign Company,
15 Defendants.

Case No. 3:22-cv-00114-LRH-CLB

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT
(SECOND REQUEST)**

16
17 IT IS HEREBY STIPULATED by and between Plaintiff Nicholas Yeatrekas ("Plaintiff"),
18 through his counsel The Geddes Law Firm, P.C., and Defendant Tesla, Inc. ("Defendant"), through
19 its counsel Jackson Lewis P.C., that Defendant shall have an extension up to and including July 11,
20 2022, in which to file a response to Plaintiff's Complaint. This Stipulation is submitted and based
21 upon the following:

- 22 1. Defendant's response to the Complaint is currently due on June 21, 2022.
- 23 2. On June 13, 2022, the parties engaged in a telephonic conference to discuss whether
24 this matter should be dismissed and refiled through JAMS.
- 25 3. During this conversation, the parties agreed that this matter should be dismissed,
26 without prejudice, so Plaintiff could file a complaint with JAMS. However, Plaintiff indicated that
27 before dismissing this matter, Plaintiff intended to file an Amended Complaint based upon a new
28 right to sue letter.

1 4. The parties agreed that Plaintiff would file an Amended Complaint and the parties
2 would then stipulate to voluntarily dismiss this matter, without prejudice.

3 5. The parties further agreed that due to the forthcoming stipulated dismissal,
4 Defendant would not file a response to the Complaint in this Court. Instead, Defendant would file
5 a responsive pleading through JAMS.

6 6. Accordingly, the parties agreed to extend Defendant's deadline to file an Answer
7 from June 21, 2022, to July 11, 2022. This extension will provide the parties sufficient time for
8 Plaintiff to file an Amended Complaint and for the parties to submit a stipulation dismissing this
9 matter without prejudice.

10 7. This is the second request for an extension of time for Defendant to file a response
11 to Plaintiff's Complaint.

12 8. This request is made in good faith and not for the purpose of delay.

13 Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or
14 be construed as waiving any claim or defense held by any party hereto.

15 Dated this 21st day of June, 2022.

16 THE GEDDES LAW FIRM, P.C.

JACKSON LEWIS P.C.

17 /s/Kristen R. Geddes

/s/ Deverie J. Christensen

18 KRISTEN R. GEDDES

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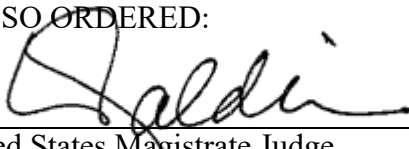
Attorneys for Defendant

22 *Nicholas Yeatrekas*

Tesla, Inc.

23 **ORDER**

24 IT IS SO ORDERED:

25 
26 United States Magistrate Judge

27 Dated: June 22, 2022

28 4857-6221-9044, v. 2